

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

RAYMOND WOOLLARD, et al.,)	Case No. 1:10-cv-02068-JFM
)	
Plaintiffs,)	DECLARATION OF
)	RAYMOND WOOLLARD
v.)	
)	
TERRENCE SHERIDAN, et al.,)	
)	
Defendants.)	
)	

DECLARATION OF RAYMOND WOOLLARD

I, Raymond Woollard, am competent to state, and testify to the following based on my personal knowledge:

1. I am an honorably-discharged Navy veteran, residing on a farm in a remote part of Baltimore County.
2. On Christmas Eve, 2002, I was at my home with my wife, son, daughter, and my daughter's children, when an intruder broke into the home by shattering a window. I trained my shotgun on the intruder, but he wrested the shotgun away, and a fight broke out between us. The fight ended when my son retrieved another gun and restored order pending the police's arrival.
3. My wife called the police, but it took the police approximately 2.5 hours to arrive, owing to some confusion on their part as to the county in which our house is located.
4. The intruder was convicted of first degree burglary, receiving a sentence of three years probation. The probation was violated with an assault on a police officer and another burglary at a different residence, which finally landed him in prison.

5. I was issued a permit to carry a handgun, which was renewed in 2005 shortly after the intruder was released from prison. The intruder lives approximately three miles from us.

6. I applied to renew my handgun carry permit a second time, but on February 2, 2009, was advised that my application was incomplete: "Evidence is needed to support apprehended fear (i.e. - copies of police reports for assaults, threats, harassments, stalking)." Exhibit A is a true and correct copy of the letter I received from the state police to that effect.

7. On April 1, 2009, Terrence Sheridan denied my handgun carry permit renewal application. Exhibit B is a true and correct copy of the letter I received from the state police to that effect.

8. I requested an informal review of the permit renewal application denial. The informal review resulted in a second denial on July 28, 2009. Exhibit C is a true and correct copy of the letter I received from the state police to that effect.

9. I administratively appealed to the Handgun Permit Review Board. In a November 12, 2009 decision by Defendants Gallagher, Goldstein, and Thomas, the Board affirmed the denial of my application, finding that I had "not submitted any documentation to verify threats occurring beyond [my] residence, where [I] can already legally carry a handgun." Accordingly, the Board found I had "not demonstrated a good and substantial reason to wear, carry or transport a handgun as a reasonable precaution against apprehended danger in the State of Maryland." Exhibit D is a true and correct copy of the Board's decision.

10. In addition to and quite apart from any threat posed by the man who invaded our home, I would carry a functional handgun in public for self-defense, but refrain from doing so because I fear arrest, prosecution, fine, and imprisonment as I do not possess a license to carry a handgun.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 9 day of November, 2010.


Raymond Woolliard